

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH DAKOTA  
CENTRAL DIVISION**

---

CHAD MARTIN HELDT, CHRISTI  
W. JONES, SONJA CURTIS, and  
CHERYL A. MARTIN, individually  
and on behalf of all similarly  
situated individuals

*Plaintiffs,*

v.

PAYDAY FINANCIAL, LLC, d/b/a  
Lakota Cash and Big Sky Cash;  
WESTERN SKY FINANCIAL, LLC,  
d/b/a Western Sky Funding, Western  
Sky, and Westernsky.com; CASHCALL,  
INC; and WS FUNDING, LLC,

*Defendants.*

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

Case 3:13-cv-3023-RAL

---

**Proposed Intervenor's Motion to Intervene to  
Object to the Proposed Settlement and to  
Continue the Preliminary-Approval Hearing by 90 days**

---

Proposed Intervenor's Thomas Brown, Monica Johnson, Melinda Long, Renee Holmes, Kevin Hayes, Leslie Jan Lydon, Elizabeth Jackson, Abraham Inetianbor, James Binkowski, Deborah Jackson, Linda Gonnella, Jeffrey Moore, Lisa Walker, and Joshua Parnell hereby move to intervene to object to the proposed settlement. In addition, Proposed Intervenor's move to continue the preliminary-approval hearing for ninety (90) days. For the reasons set forth in the accompanying memorandum, Proposed Intervenor's respectfully request that the Court grant their motion to intervene in this matter.

Respectfully submitted,

/s/ Judith K. Zeigler

---

Judith K. Zeigler

JUDITH K. ZEIGLER LAW, PC  
P.O. Box 1448  
Sioux Falls, SD 57101-1448  
(605) 222-8649 (telephone)  
(888) 231-0577 (facsimile)  
judy@jkzlaw.com

Matthew W.H. Wessler\*  
Deepak Gupta\*  
GUPTA WESSLER PLLC  
1735 20th Street, NW  
Washington, DC 20009  
(202) 888-7792 (facsimile)  
(202) 888-1741 (telephone)

Mona L. Wallace  
John S. Hughes  
WALLACE & GRAHAM, P.A.  
525 N. Main Street  
Salisbury, NC 28144  
(704) 633-5244  
mwallace@wallacegraham.com  
jhughes@wallacegraham.com  
*Counsel for Thomas Brown, Monica Johnson,  
Melinda Long, Renee Holmes, Kevin Hayes, Leslie  
Jan Lydon and Elizabeth Jackson (North Carolina)  
Counsel for Abraham Inetianbor (Florida)*

Janet R. Varnell  
VARNELL & WARWICK, P.A.  
P.O. Box 1870  
The Villages, FL 32158  
(352) 753-8600  
jvarnell@varnellandwarwick.com  
*Counsel for Abraham Inetianbor (Florida)*

Daniel A. Edelman  
James O. Lattuner  
Tara L. Goodwin  
EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC  
20 S. Clark Street, Suite 1500  
Chicago, Illinois 60603  
(312) 739-4200  
*Counsel for James Binkowski, Deborah Jackson,  
and Linda Gonnella (Illinois)*

Robert R. Sparks  
STRAUSS TROY CO., LPA  
150 East Fourth St.  
Cincinnati, OH 45202  
(513) 629-9417  
rrsparks@strausstroy.com  
*Counsel for Jeffrey Moore (Kentucky)*

Matthew T. Sanning  
224 Main St.  
Augusta, KY 41002  
mattsanning@windstream.net  
*Counsel for Jeffrey Moore (Kentucky)*

Nathan DeLadurantey  
Heidi N. Miller  
DELADURANTEY LAW OFFICE LLC  
735 W. Wisconsin Ave., Suite 720  
Milwaukee, WI 53233  
(414) 377-0518  
nathan@dela-law.com  
*Counsel for Lisa Walker (Wisconsin)*

Thomas J. Lyons, Jr.  
CONSUMER JUSTICE CENTER, P.A.  
367 Commerce Court  
Vadnais Heights, MN 55127  
(651) 770-9707  
Tommycjc@aol.com  
*Counsel for Lisa Walker (Wisconsin)*

James Hurt  
HURT STOLZ, P.C.  
345 West Hancock Avenue  
Athens, GA 30601  
(706) 395-2750  
jhurt@hurtstolz.com  
*Counsel for Joshua Parnell (Georgia)*

Chris Armor  
ARMOR LAW, LLC  
160 Clairemont Ave., Suite 200  
Decatur, GA 30030  
(678) 690-8489  
chris.armor@armorlaw.com  
*Counsel for Joshua Parnell (Georgia)*

*Counsel for Proposed Intervenors*

Dated: November 18, 2015

\* *Pro hac vice* admission pending